

COUNTY OF HENNEPIN

ss. AFFIDAVIT OF THOMAS CHORLTON  
) Case No. 23-MJ-611 (JFD)

I, Thomas Chorlton, being duly sworn under oath, depose and state as follows:

1. Your Affiant is a Special Agent of the Federal Bureau of Investigation ("FBI") and have been so employed for approximately 19 months. I am currently assigned to the FBI Minneapolis Joint Terrorism Task Force and have been so assigned for approximately 15 months. Prior to working for the FBI, I was a patrol officer for the Minneapolis Police Department for eight years. Through my combined law enforcement experience, I have assisted on multiple cases involving illegal possession of firearms, gang crime, homicides and drug related crimes, which have resulted in arrests, searches, seizures, along with interviews and transports of arrested parties, witnesses and victims. Your Affiant's current duties and responsibilities include conducting criminal investigations of individuals and entities for possible violations of federal laws, including Title 18 U.S.C. § 922(g) (Possession of Ammunition by a Prohibited Person).

2. This affidavit is submitted in support of a criminal complaint against Michael Marshawn Lee Dalton (herein "DALTON") on grounds that he knowingly possessed a ammunition as a felon, thereby committing a violation of 18 U.S.C. § 922(g)(1).

3. This affidavit is made for the purpose of establishing probable cause in support of a federal arrest warrant; and therefore, contains only a summary of relevant facts. The facts and information set forth in this affidavit are based on my

personal observations, my training and experience, and, as specifically attributed below, information obtained from law enforcement officers, reports, and witnesses. To the extent that any information in the affidavit is not within my personal knowledge, it has been made available to me through law enforcement sources, and I believe such information to be reliable.

#### **Probable Cause**

4. Working with multiple other state and federal agencies, the FBI is investigating the “Lows” street gang. The “Lows” is a north Minneapolis criminal gang that engages in drug trafficking, firearm possession, and acts of violence. The Lows are comprised of gang subsets that go by different names, including the “Skitz Squad.” The Lows are engaged in a violent rivalry with the Highs, another Minneapolis criminal gang that engages in drug trafficking, firearm possession, and acts of violence.

5. On March 28, 2023, officers from the Minneapolis Police Department recovered a firearm and ammunition from DALTON, a convicted felon and suspected member of the Lows street gang.

6. That day, officers with the MPD’s Gun Investigation Unit were participating in a Focused Enforcement Detail as part of a violent crime initiative in Minneapolis. The detail was intelligence driven and concentrated on areas that have seen drastic increases in gun violence, to include shootings, shots fired, murders and illegal gun possession.

7. Prior to the enforcement detail, an MPD officer received information

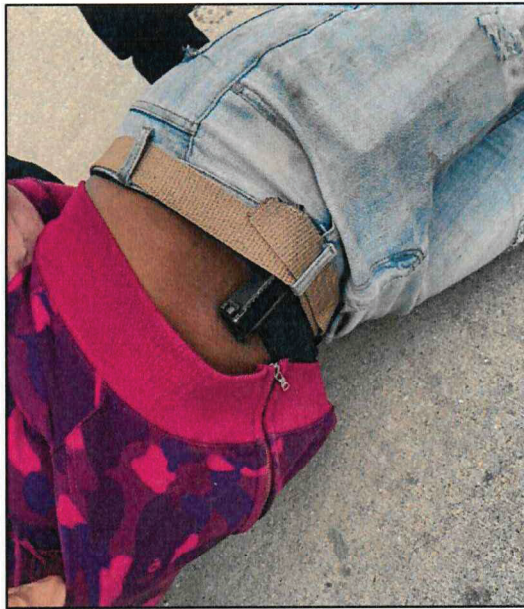
about a target named Michael DALTON. The information indicated that DALTON was in possession of a firearm. Based on this information, the officer obtained a duly authorized search warrant from a Hennepin County judge.

8. The MPD officer received further information that DALTON would be arriving in the area of the enforcement detail in South Minneapolis. Based on the information, the officer requested surveillance and assistance in executing the search warrant on DALTON in the area of South 9th Street and 22nd Avenue South in South Minneapolis. The objective of the unit was to spot DALTON during surveillance and then send marked squads with uniformed officers in to search him pursuant to the warrant. While preparing to execute the search warrant, the officer told other law enforcement officers that he believed DALTON would likely be armed with a semi-automatic handgun with an extended magazine.

9. Officers located DALTON. During the detail, officers conducting surveillance observed a black male, later confirmed to be DALTON, wearing a purple sweatshirt. Officers observed that the individual had a height and weight consistent with DALTON.

10. Officers moved in to execute the search warrant. Officers gave DALTON loud clear commands to get on the ground. DALTON complied with no resistance. An officer asked whether DALTON had a gun on his person, and DALTON told the officer that he did. Officers lifted DALTON's shirt and immediately located a firearm sticking out of his waistband.





11. As officers helped DALTON stand up, DALTON said he was “going away.” Based on my training and experience, I understand DALTON to mean that he was concerned he was going away to prison based on law enforcement’s recovery of the firearm from his waistband.

12. The firearm that officers recovered from DALTON’s waistband was a semi-automatic Polymer 80 with an extended magazine. A Polymer 80 is a type of un-serialized, privately made firearm, commonly referred to as a “ghost gun.”

13. The firearm was loaded with an extended magazine and a round in the chamber. Officers recovered 20 total bullets from the magazine and chamber. The bullets are stamped “FC Luger” and are 9mm ammunition manufactured by Federal Ammunition.



14. I have consulted with an interstate nexus expert of the Bureau of Alcohol, Tobacco, Firearms and Explosives, who has made a preliminary determination that the components comprising the Federal Ammunition, including the propellant, were manufactured outside of Minnesota. Therefore, the ammunition traveled in interstate commerce prior to DALTON possessing it in Minnesota.

15. Following his arrest, DALTON provided a recorded Mirandized statement to law enforcement. In the statement, DALTON said that he was on probation for a fifth-degree drug possession case and had previously been convicted of robbery. DALTON acknowledged that he was carrying the gun for protection.

16. In the statement, DALTON also acknowledged that he was affiliated with the "Skitz Squad." Based on my training, experience, and consultation with other state and federal agencies, as noted above, I know that the "Skitz Squad" is a


subset of the “Lows” street gang. The “Lows” is a north Minneapolis criminal gang that engages in drug trafficking, firearm possession, and acts of violence. The Lows are engaged in a violent rivalry with the Highs, another Minneapolis criminal gang that engages in drug trafficking, firearm possession, and acts of violence.

17. Based on my review of DALTON’s criminal history, he has been convicted of multiple felony level crimes including aggravated 1st degree robbery and 3rd degree assault, which were each punishable by a term of imprisonment exceeding one year. According to a search of publicly available records, DALTON received a sentence of at least one year and one day for one of these convictions. Based on these convictions, DALTON is prohibited from possessing firearms or ammunition.

18. Based on the above information, I submit there is probable cause to believe that DALTON did knowingly possess ammunition while being a felon, thereby committing a violation of 18 U.S.C. § 922(g)(1).

19. In order to avoid premature disclosure of this investigation, guard against the possibility of flight by DALTON, and better ensure the safety of any law enforcement officers, your Affiant requests that the arrest warrant, complaint, and

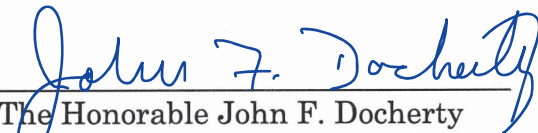
accompanying affidavit, insofar as they reveal an ongoing investigation, be sealed until further order of this Court.



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Thomas Chorlton  
Special Agent  
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before me  
by reliable electronic means (Facetime and email)  
Pursuant to Fed. R. Crim. P. 41(d)(3)  
this 11<sup>th</sup> day of August 2023.



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The Honorable John F. Docherty  
United States Magistrate Judge  
District of Minnesota